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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING  
MOTION TO SEAL**

Referral: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is the Joint Submission in Response to Dkts. 480 and 481 re: Sealing Portions of the Joint Discovery Letter Briefs (“Joint Submission”).

Having considered the Joint Submission, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document	Text to Be Sealed	Basis for Sealing Portion of Document
Exhibit A of the Order	GRANTED as to the portions at:  Pages 1, 7, 11-21	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google’s internal systems and operations, including details related to internal projects, data signals, and logs and their proprietary functionalities, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors.

**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE SUSAN VAN KEULEN  
United States Magistrate Judge